

EXHIBIT 9

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CORPORAL TRINIDAD NAVARRO,

Plaintiff,

v.

**CHRISTOPHER A. COONS,
individually and in his official capacity;
GUY H. SAPP, individually and in his
official capacity; and NEW CASTLE
COUNTY, a municipal corporation,**

Defendant.

C.A. No. 05-565 (GMS)

JURY TRIAL DEMANDED

AFFIDAVIT OF CORPORAL TRINIDAD NAVARRO

NEW CASTLE COUNTY :
: SS.
STATE OF DELAWARE :

I, TRINIDAD NAVARRO, Affiant, depose and say:

1. I am the Plaintiff in the above-captioned matter.
2. I was appointed Public Information Officer at the New Castle County Police Department by then Chief Jack Cunningham in 1998.
3. Chief Cunningham served under County Executive Tom Gordon whose administration immediately preceded the Coons administration.
4. I observed a bitter rivalry during the primary election campaign that occurred in 2004 for the position of County Executive between Defendant Chris Coons and outgoing Chief Administrative Officer Sherry Freebery.
5. Following this primary election, I observed that many County employees including sworn officers with the New Castle County Police Department were

identified with either candidate Coons or candidate Freebery depending on the individual's political support.

6. I was identified by Coons' supporters to be in a group of supporters that supported the outgoing administration as well as Freebery's candidacy over Coons' candidacy.
7. I observed that those expressing loyalty to Chief David McAllister, who had been appointed police chief by former County Executive Tom Gordon, were deemed to be supportive of the outgoing Gordon/Freebery administration, political rivals of the Coons campaign and administration.
8. I testified in my deposition that many New Castle County Police Officers have been retaliated against as set forth in the Statement of Facts and I believe that each of these individuals was deemed to have been loyal to the Gordon/Freebery administration.
9. I believe that the argument by the County administration on or about July 1, 2005 that the promotion of Sergeants would not help put more police officers on the road is incorrect because those Sergeants are working (Street Sergeants) who add to the patrol strength of the Department.



TRINIDAD NAVARRO

SWORN TO AND SUBSCRIBED before me this 25th day of May, 2007.


NOTARY PUBLIC

